

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**TRUSTEES OF THE NATIONAL ASBESTOS *
WORKERS MEDICAL FUND, *et al.*, ***

Plaintiffs, *

v. * **Case No: AMD 02-2792**

On-Time Insulation, Inc., *

Defendant. *

**JOINT MOTION FOR EXTENSION OF DISPOSITIVE PRETRIAL MOTIONS
DEADLINE**

Plaintiffs Trustees of the National Asbestos Workers Medical Fund, Trustees of the Local 24 Pension Fund, and Trustees of the Local 24 Apprenticeship Fund (collectively "the Funds") and Defendant On-Time Insulation, Inc. hereby jointly move for an extension of the dispositive pretrial motions deadline by thirty (30) days to allow the parties to further explore a possible settlement of this case. Good cause exists for the granting for this motion:

1. On October 28, 2002, the Court issued a scheduling order, which set March 31, 2003 as the as the deadline for filing dispositive pretrial motions.

2. In response to discovery requests submitted by the Funds, the Defendant has provided the Funds with copies of wage and payroll records. These records were forwarded to the Funds' auditor, and on March 20, 2003, the Funds' auditor issued a preliminary audit report, which revealed amounts due and owing by the Defendants to the Funds. At that time, the auditor also provided the Funds with a list of additional wage and payroll records that the auditor may need to review to finalize the audit report.

3. The preliminary audit report and list of additional wage and payroll records requested to complete the audit have been forwarded to counsel for the Defendant for review. Once the

documents are reviewed and an agreement is reached regarding the additional documents requested, the parties will attempt to reach a negotiated settlement over all issues.

4. The Plaintiffs and Defendants believe that settlement of this case is possible and jointly request an additional thirty-day extension of the deadline for dispositive pretrial motions, which is presently March 31, 2003, in order to allow the parties to make a concerted effort at resolving the issues in this case without further litigation.

WHEREFORE, the parties respectfully request the Court extend the deadline for dispositive pretrial motions by thirty days to allow the parties to continue to explore settlement of this case.

DATED this _____ day of _____, 2003.

Respectfully submitted,

By: _____
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Inc.

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ORDER

The Plaintiffs and Defendants have jointly moved for a thirty-day extension of the deadline for dispositive pretrial motions, which is presently March 31, 2003. Upon considering the joint motion, it is hereby GRANTED and further ORDERED:

1. That the deadline for dispositive pretrial motions deadlines is extended to May 1, 2003.

DATED this _____ day of _____, 2003.

**Honorable Andre M. Davis
UNITED STATES DISTRICT JUDGE**